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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 14, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW Room TWB-204
Washington, DC 20554

RE: **Notice of ex parte meeting: In the Matter of Numbering Resource Optimization, CC Docket No. 99-200**

Dear Ms. Salas:

On Monday, November 13, 2000 Gil Orozco, Bill Adair, Brian Baldwin, and I on behalf of SBC met with Yog Varma (Deputy Chief, Common Carrier Bureau), Chuck Keller, Diane Harmon, Aaron Goldberger, Jennifer Gorney, and Sanford Williams.

The purpose of the meeting was to provide information regarding unassigned number porting (UNP). The attached presentation served as a basis for the discussion.

Sincerely,

Fred Goodwin

Attachment

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Unassigned Number Porting (UNP)

Presentation to FCC Staff

November 13, 2000

The Benefits of UNP are Overstated

⇒ Promoted by CLECs as a competitive issue, not a number conservation measure

- "UNP…is not a conservation mechanism…" WorldCom quote to the Texas Number Conservation Implementation Team in April 1999

⇒ As a number optimization measure

- Assertion that new competitors will need only a "handful" of numbers to begin operations is a myth
  - Each new switch needs at least one unique NXX per LATA for LRN
  - CLECs initially target large business customers
  - Without the "footprint" argument, UNP fails miserably as a viable optimization measure

⇒ As a method of serving specific customers

- FCC NRO requirements make it is no longer possible to provide customers with a wide choice of numbers, vanity or otherwise
- SBC has already altered its internal practices to restrict searches for "good" numbers

UNP Is Not A Simple Solution

⇒ Despite claims to the contrary UNP would require significant changes to current LNP processes

⇒ All LNP activity is initiated via a disconnect service order

- Validates name and telephone number
- Disconnects the service, closes the billing account, and removes the number from all records and inventory of the previous service provider
- Generates entries at the NPAC

⇒ Non-working numbers cannot be ported today using existing mechanized systems

- Would require a new type of service order to validate availability of the number in inventory, billing system and switch yet circumvent normal disconnect activity in the network and internal systems
- New porting transaction type would be required to prevent an automatic snap back when a number assigned from a UNP footprint is disconnected
- Modifications required to the mechanized local service request process

Efficient Data Representation (EDR) Compromised by UNP

⇒ UNP would seriously undermine the benefits of EDR

⇒ EDR designed to prevent exceeding SCP/STP data base storage capacity limitations

- Maximum capacity of many vendors' SCPs will be reached
- Efficiencies gained in download process will be lost
- EDR only consolidates 1K pooling records
- Current LNP volumes are around 10M
- Projected volumes with wireless LNP are 16M/year

⇒ LNP architecture was never designed to be the primary means of obtaining numbers

- Current LNP network/system architecture was designed to support porting of working TNs
- Pooling possible only through the use of EDR
- Addition of widespread UNP may be the breaking point

UNP Requires an Administrator

⇒ UNP involves number administration

- One carrier must rely on another to provide it with number resources
- The FCC took specific measures to migrate number administration to a neutral 3rd party (required by TA96)
- Neutral administration also in place for 800 service, LNP
- In a competitive environment, as well as one in which the access to numbers is restricted, UNP will provide some carriers with an incentive to obtain numbers they otherwise are not entitled to
- Absent close scrutiny, UNP may result in a free-for-all number grab

⇒ Absent an administrator, there will be no way to ensure that the requested numbers are truly needed, that denials are legitimate, or that a particular service provider is being unfairly targeted as a donor

Number Pooling Dramatically Limits UNP's Application

⇒ UNP and pooling present an unworkable combination

- In a pooling environment, number inventories are drastically reduced
  - Despite claims to the contrary, UNP will be used to export large quantities of sequential numbers
  - In Illinois, SBC has already experienced long delays in replenishing unexpected shortfalls
- The time and investment spent deploying EDR will be compromised
- UNP will contaminate blocks otherwise available for donation
- Procedure used to donate or move blocks is significantly different from UNP

⇒ National rollout of pooling should not be hindered by other unproven number administration measures such as UNP

- Pooling must be given a chance to work
- Implementation of the national 1K pooling should be industry's first priority, followed by an assessment of its impact on the NPAC, LNP network and supporting OSSs before considering new number conservation measures

A Word About ITN Pooling...

⇒ All carriers express a continuing need to maintain some level of inventory to handle day-to-day service provisioning activity

⇒ 1K block pooling represents a reasonable balance between the need to maintain individual inventories and the need to share numbering resources

⇒ The 800 SMS handles the equivalent of only a handful of NPAs

   – In the SBC region alone, there are over 100 NPAs

⇒ An ITN system must be capable of providing real-time access

   – Thousands of service representatives will be attempting to search and process numbers at exactly the same moment

   – Millions of orders processed each year

   – Disconnect process will completely change

⇒ The report submitted by the NANC in October, 1998 on ITN deployment requirements and intervals is still valid